

# Exhibit F

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WASHINGTON:

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

NWDC RESISTANCE AND COALITION OF ANTI-RACIST  
WHITES,

PLAINTIFF,

VS.

CASE NO. 3:18-CV-05860-JLR

IMMIGRATION & CUSTOMS ENFORCEMENT, TAE D.  
JOHNSON, IN HIS OFFICIAL CAPACITY AS ACTING  
DIRECTOR OF IMMIGRATION AND CUSTOMS ENFORCEMENT;  
AND ALEJANDRO MAYORKAS, IN HIS OFFICIAL CAPACITY  
AS SECRETARY OF HOMELAND SECURITY,

DEFENDANT.

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ZOOM DEPOSITION OF,  
MELESIO MORALES MATA  
AND HOSTED BY COUNTY COURT REPORTERS, INC.

FRIDAY, SEPTEMBER 22, 2023  
10:07 A.M.

UNITED STATES ATTORNEY'S OFFICE  
700 STEWART STREET  
SUITE 5220  
SEATTLE, WASHINGTON 98101

**APPEARANCES****ON BEHALF OF THE PLAINTIFF,****NWDC RESISTANCE AND COALITION OF ANTI-RACIST****WHITES AND APPEARING BY ZOOM:**

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1 A. No, go ahead.

2 Q. I was going to say take all the time  
3 you need to read this paragraph that starts with  
4 the bullet points at Melesio Morales Mata, take  
5 all the time you need to read it and let me know  
6 when you're done.

7 A. Okay.

8 (WHEREUPON, the Witness examined the document  
9 previously marked Exhibit-1 for identification.)

10 A. Okay yes. Yes, I read that.

11 Q. Okay.

12 A. I mean.

13 Q. Now I want to focus on that last  
14 sentence, it says although he continues to fear  
15 retaliation, he recently began participating in  
16 La Resistencia once again because he wants to  
17 prevent others from facing the same retaliation  
18 he endured. Did I read that correctly?

19 A. Yes.

20 Q. And as I said, this discovery response  
21 was provided to us by La Resistencia in this  
22 litigation. Was La Resistencia correct when they  
23 indicated that you recently began participating  
24 in La Resistencia once again because you want to  
25 prevent others from facing the same retaliation

1 **you endured?**

2 A. Like this like, the last part I would  
3 say like not sure, because I don't feel like I'm  
4 doing nothing right now, I'm just, I'm not  
5 thinking of doing it, I mean, Wendy wanting to,  
6 Wendy that it says after I recent, I mean Wendy  
7 didn't want me to come back, he, she text me, or  
8 call me, or like by messenger, but I would say  
9 no, I'm, I'm not, I don't even say nothing, I  
10 just don't want to deal right now with which is  
11 my family, me and my family I worry about.

12 Q. **You want to focus on your family, your**  
13 **work, and you right now?**

14 A. Yes, hundred percent.

15 Q. **Okay.**

16 A. And my kids, my kids, they do sports so  
17 like I'm really, all the free time that I have is  
18 for my kid's sports.

19 Q. **So the reason you don't want to**  
20 **participate right now is because you want to**  
21 **focus on your family, your kids, your work, and**  
22 **yourself, is that correct?**

23 A. Well I'm not, that's, that's one thing  
24 that I put on there, there are things like I got  
25 scared, I got scared, that's the reality, they

CERTIFICATE OF REPORTER AND SECURE ENCRYPTED  
SIGNATURE AND DELIVERY OF CERTIFIED TRANSCRIPT

I, **COLLEEN GREGORY-GETTEL**, Notary Public, do  
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was reduced to written form, that the transcript  
prepared by me or under my direction, is a true and  
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IN WITNESS HEREOF, I have here unto set my hand  
this 3RD day of OCTOBER, 2023.



/s/COLLEEN GREGORY-GETTEL

COURT REPORTER / NOTARY

NOTARY REGISTRATION NUMBER: 7965787

MY COMMISSION EXPIRES: 07/31/2025